

----- Forwarded by Janet Goodwin/DC/USEPA/US on 10/15/2008 10:54 AM-----

"Douglas J. Marshall" <DMarshall@smein
To c.com> Janet Goodwin/DC/USEPA/US@EPA
cc 10/15/2008 10:45AM
Subject: Opinion on Waste Pharmaceuticals Questionnaire

Ms. Goodwin, Being both professionally and personally interested in the topic of pharmaceutical waste disposal I wish to comment on the topic below. I believe that your office should include doctor's offices, veterinary offices, university clinics and prison clinics in your information collection efforts regarding pharmaceutical waste. It may be true that none of these providers individually generate significant amounts of pharmaceutical waste. But I think that collectively they dispose of enough waste pharmaceuticals to warrant attention. The idea that waste pharmaceuticals may be released into the environment in any amount should be of concern to the public and the EPA. My opinion is based on the observations I made during the seven years I spent as abio/hazardous waste manager for a large healthcare system. I recall the professional office buildings attached to each of our hospitals.

I also recall how the infection control practices and the biological waste disposal practices seemed to be relaxed on the private practice side. In my eyes a double standard already exists for hospital and private practice medical waste and infection control, why risk creating a double standard for pharmaceutical waste disposal as well?

Respectfully EPA to Collect information on Disposal of Unused Pharmaceuticals EPA is planning to submit a proposed Information Collection Request(ICR) to the Office of Management and Budget (OMB) in compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.). The proposed ICR will cover hospitals, long-term care facilities, and veterinary hospitals via detailed questionnaires. Before submitting the ICR to OMB for review and approval, EPA is soliciting comments on specific aspects of the proposed information collection. EPA is also soliciting comments on the scope of the ICR. EPA plans to survey hospitals, long-term care facilities, and veterinary hospitals, but is seeking feedback on whether or not to include doctor's offices, veterinary offices, university clinics, and prison clinics. This proposed ICR includes two detailed questionnaires--one tailored for hospitals and long-term care facilities and the other for veterinary hospitals. EPA plans to collect information on current disposal practices and alternative practices for managing unused pharmaceuticals. In addition, this data will give the types and amounts of unused pharmaceuticals being disposed. To date, there is no known source of this data. The benefit of collecting this data directly from health-care facilities is to highlight alternative disposal methods for medical and veterinary facilities. EPA will use this information to estimate waste generation reductions that the use of Best Management Practices can achieve.

Doug Marshall, CHMM Industrial Hygienist
ENGINEERING INTEGRITY.
S&ME, Inc.

2713 Kanasita Drive
Ph: 423-826-2110
Mobile: 423-827-4027
www.smeinc.com

Hixson TN 37343 Map
Fax: 423-870-1005
dmarshall@smeinc.com

This electronic message and its attachments are forwarded to you for convenience and “for information only.” The message may represent a summary with limitations, conditions and further explanations omitted in the interest of brevity and time constraints. The contents of this electronic message and any attachments may be preliminary and incomplete, subject to review and revision. If this electronic transmittal contains Findings, Conclusions or Recommendations, S&ME, Inc. will submit a follow-up hard copy via mail or overnight delivery for your records, and this hard copy will serve as the final record. In the event of conflict between electronic and hard copy documents, the hard copy will govern. This electronic message and any attachments transmitted with it are the property of S&ME, Inc. and may contain information that is confidential or otherwise protected from disclosure. The information this electronic message contains is intended solely for the use of the one to whom it is addressed, and any other recipients should delete this electronic message and destroy all copies. VER 4, Rev1 -- 031207,